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May 17, 2013

Ms. Sarah Juris
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

IDENTIFICATION NUMBER: C00518282

REFERENCE: JULY QUARTERLY REPORT (04/01/2012 - 06/30/2012)

Dear Ms. Juris:

This statement is in response to the Commission's letter dated April 14, 2013. The Commission requested additional information on seven items.

1. The Commission requested clarification for a contribution on Schedule A of our report from certain individuals who have a mailing address outside of the United States. Our Committee has safeguards in place to ensure that contributions are made only by eligible donors. Our committee has confirmed that all donors attached to this letter are eligible donors and are not foreign nationals.

2. The Commission requested clarifying information regarding our in-kind donations. Our committee has researched all in-kinds reported as receipts and as disbursements. There are three amounts (\$85.56, \$67.50, and \$28.88) reported as in-kind disbursements which were not itemized as in-kind receipts on Schedule A because these amounts did not result in these individuals exceeding the \$200 itemization threshold for line 11a. The amounts are however included in our committee's reported total of unitemized receipts. Our committee's totals of receipts and disbursements are correct as reported, and thus, no amendment is required with respect to our reporting of in-kind receipts and disbursements.

3. The Commission requested clarifying information regarding transfers from other Committees which had not been disclosed on their reports of receipts and disbursements. Our committee has researched each of the receipts identified, and can confirm that each was received from the donor's federal account. With the exception of contributions received from National Health Corporation PAC and Texas Spine and Joint Hospital LTD. PAC, the donor took advantage of the option provided by Commission regulations of making the contribution payable to one of the participants in the joint committee. Additionally, in accordance with Commission regulations and prior enforcement cases, each of these donations was allocated in full to the designated participant. Our committee has no further information regarding the contributions from the two Committees named above.

4. The Commission requested clarification of several itemized disbursement descriptions. Our committee has amended our report to provide clarifying information.

5. The committee has reviewed all reimbursements to individuals for travel and subsistence and confirms that no further itemization is required under any Commission regulations for these expenditures.

6. The Commission requested clarifying information regarding reimbursements to individuals for expenses other than travel and subsistence disclosed on Schedule B supporting Line 21(b). All disbursements to individuals disclosed on Schedule B supporting Line 21(b) are either reimbursements for travel and subsistence or in-kind contributions. The committee has reviewed all reimbursements to individuals for expenses other than travel and subsistence and confirms that no further itemization is required under any Commission regulations for these expenditures

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7. The Commission requested clarifying information regarding a refund of a contribution which your letter indicated was not reported by our committee. However, our committee disclosed the contribution on this report. Please see Transaction ID: SA11.1105821.

This should answer the Commission's inquiry.

Sincerely,

Keith A. Davis
Treasurer
